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OFFICE OF THE ATTORNEY GENERAL
EXECUTIVE BUREAU

July 5, 2014

RE: Comment on Partners Acquisition of South Shore Hospital

Ms Coakley,

I am writing in support of the Partners acquisition of South Shore Hospital.

When one looks at the south shore healthcare market there are currently 2 major players.

Because of their close affiliation Atrius and Beth Israel Deaconess medical center should be considered a single entity. Atrius refers all of their complex patients to BIDMC. In addition Atrius has an inadequate number of in house specialists so that care is provided by BIDMC.

Atrius/BIDMC owns two hospitals on the south shore, Milton and Plymouth, outright. They are affiliated with a third, Signature Brockton. Atrius /BIDMC owns 8 group practices/"health centers" totaling over 130 physicians on the south shore alone. This total does not include Signature physicians who also refer to BIDMC or group practices in Milton and Plymouth directly owned by BIDMC.

Steward owns 3 hospitals, Norwood, Quincy, Good Samaritan, and 3 group practices on the south shore alone.

If the Partners acquisition goes through they will control 1 hospital and 1 group practice with 65 physicians.

Atrius/BIDMC has been most vocal in opposing this agreement whining about monopoly in the media. When one looks at the situation on the south shore it's obvious the Atrius/BIDMC complaints about monopoly are ludicrous. Atrius/BIDMC currently dominates the south shore healthcare market, especially in primary care. Atrius/BIDMC isn't afraid to use this domination against a rival as its attempts to choke off patient flow to Steward's Quincy Hospital has shown. Partner's acquisition of South Shore Hospital is a threat to this control and explains why they are objecting so strongly.

Much has been made about the merger "driving up costs" but little has been mentioned about the group of people that this merger will definitely drive down costs for. Partners Healthcare is the largest employer in MA. The state has been encouraging employers to provide limited provider networks as a way to supposedly drive down costs. Partners has modified its benefit programs charging higher co-pays for obtaining care outside of the Partners system. Because of the public transit connections many Partners employees live on the south shore. The Red Line provides direct access to MGH with commuter rail lines feeding into it. Because Partners doesn't have any presence on the south shore the many employees living here are paying more for their healthcare that they would otherwise.

I also find it reprehensible that the so called Health Policy Commission seems to feel it should be able to require that south shore residents must obtain care from Atrius/BIDMC or Steward. This power was

certainly not granted to them in the faulty legislation that created this group.

In conclusion, the Partners acquisition of south shore hospital will introduce additional completion, interfere with Atrius/BIDMC uncompetitive behavior, reduce costs for a large group of people living in the area, and allow the people of the south shore the same choice in where they receive healthcare that other part of metro Boston already enjoy.

A handwritten signature in cursive script, appearing to read 'Al Ferreira'.

Al Ferreira

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